

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

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V.

Crim No. 4:11-CR-00628-001

JODI LATSON

**UNOPPOSED MOTION REQUESTING EXTENSION OF TIME
TO SELF SURRENDER TO INSTITUTION OF DESIGNATION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **JODI LATSON**, by and through his attorney of record, ROBERT A. JONES, and at his request, files this, his Unopposed Motion Requesting Extension Of Time To Self Surrender To Institution Of Designation, where pursuant to the direction of the Bureau of Prisons, he shall be required to serve his sentence. In support of this motion, Ms. Latson states the following:

I.

On June 17, 2013, the Court sentenced Jodi Latson to the custody of the Attorney General for 18 months, \$0.00 fine, Restitution, \$511923.64 to be paid of \$100.00 a month to commence 30 days after release from confinement. The Court granted Ms. Latson the privilege of voluntary surrender.

II.

Ms. Latson has complied with all his bond conditions.

III.

The U.S. Marshal Service notified Ms. Latson that she has to surrender to the Carswell FMC, Naval Air Station J ST Bldg. 3000, Ft. Worth, TX 76127, by July 31, 2013 at 2:00 P.M. Ms. Latson is presently on Probation in the 339th District Court of Harris County. She is attempting to resolve that probation prior to her reporting. Presently her son is under indictment and she is presently

attempting to assist his attorney in that matter. Ms. Latson for those reasons would request an extension of 90 Days for her to personally surrender to the Bureau of Prison in Carswell FMC.

IV.

Assistant United States Attorney, Laura M.K. Cordova and Pretrial Service Officer, Edgardo Cardenas, was consulted and does not oppose this Motion Requesting Extension of Time to Self Surrender to Institution of Designation for a period of ninety (90) days.

WHEREFORE, PREMISES CONSIDERED, Defendant, prays that his Sealed Motion To Remain Out On Bond Prior To Self Surrendering to Institution of Designation, be GRANTED.

Respectfully Submitted,

/s/ Robert A. Jones
ROBERT A. JONES
2211 Norfolk, Suite 600
Houston, Texas 77098
(713) 526-1171
(713) 528-3415 Fax
TBN 10941500
Attorney for JODI LATSON

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of July, 2013, a copy of the foregoing MOTION REQUESTING EXTENSION OF TIME TO SELF SURRENDER TO CARSWELL FMA, NAVAL AIR STATION J ST BLDG, 3000, FT. WORTH, TX 76127, of the Defendant, was served upon Laura Cordova, Assistant United States Attorney, Southern District of Texas, by via email.

/s/ ROBERT A. JONES

ROBERT A. JONES

CERTIFICATE OF CONFERENCE

I hereby certify that I have discussed the above motion with Assistant United States Attorney Laura Cordova, and she does not oppose said Motion.

Date: July 26, 2013.

/s/ Robert A. Jones

ROBERT A. JONES

CERTIFICATE OF CONFERENCE

I hereby certify that I have discussed the above motion with Pretrial Service Officer Edgardo Cardenas, and he does not oppose said Motion.

Date: July 26, 2013

/s/ Robert A. Jones

ROBERT A. JONES

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JODI LATSON

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ORDER

The defendant's unopposed motion to continue the sentencing in this case is GRANTED/DENIED. The Court finds that the ends of justice served by granting a continuance.